

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

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Jeffrey Solomon, )  
Plaintiff, )  
vs. )  
Annie Dookhan, Donald F. Keenan, Kate Corbett, ) **C.A. No.: 1:13-cv-10208-GAO**  
JudyAnn Bigby, Jon Auerbach, Julie Nassif, Linda Han, )  
Daniel Conley, and Suffolk County District Attorney's )  
Office, )  
Defendants. )  
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**STATUS REPORT**

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Now comes the Plaintiff and, as ordered by the Court on July 9, 2013, reports the following:

The Plaintiff intends to file additional related claims against the Commonwealth of Massachusetts including but not limited to state tort claims for negligence, malicious prosecution, and intentional infliction of emotional distress. The Plaintiff intends to inquire of the Commonwealth, which was put on notice pursuant to M.G.L. c. 258, §1, whether it intends to waive its Sovereign Immunity to such claims, in which case the Plaintiff may move to further amend the complaint. While the Plaintiff does not otherwise intend to amend the complaint, he reserves the right to do so, particularly in light of the related continuing investigation by state authorities. In any event, the Plaintiff does not anticipate an amendment that will make any

pending motions moot.

The Plaintiff,  
Mr. Jeffrey Solomon,  
By his Attorneys,

/s/ Victoria Kelleher

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/s/ Joseph M. Perullo

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Dated: July 19, 2013

**CERTIFICATION OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants this day as identified on the Notice of Electronic Filing (NEF).

/s/ Victoria Kelleher